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## MEMO ENDORSED

April 14, 2023

### VIA ECF

The Honorable Edgardo Ramos  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Defendants' request for an extension, until April 28, 2023,  
to file a stipulation of dismissal is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.  
Dated: April 17, 2023  
New York, New York

Re: Franco v. LTS Century Building, LLC et al., 19-cv-09846 (ER)

Dear Judge Ramos:

We represent Defendants LTS Century Building, LLC, Barnes & Noble, Inc., and Barnes & Noble Booksellers, Inc. (collectively, "Defendants") in the above-referenced matter. In accordance with Rule 1.E of Your Honor's Individual Practices, with Plaintiff's consent, and for the reasons summarized below, we respectfully write to request an extension of the parties' time to file a stipulation of dismissal from April 14, 2023 until April 28, 2023.

Although, as Defendants previously noted, the parties have finalized their Settlement Agreement (the "Agreement"), and Defendants have transmitted the settlement payment pursuant to the terms of the Agreement, Defendants, as between themselves, continue to work toward finalizing other details pertaining to certain non-monetary relief provided for under the Agreement. As Defendants must finalize those outstanding items prior to the filing of the stipulation of dismissal, and Plaintiff's filing of a stipulation of remediation, we respectfully request the relief sought herein, which, in Defendants' view, will afford them sufficient time to do so.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By: s/ Evan B. Citron  
Evan B. Citron

cc: All counsel of record (via ECF)